UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

53139

AUG 31 1992

1992 SEP -1 A 7:17

Ref: 8HWM-FF

Mr. Frazer Lockhart
U.S. Department of Energy
Rocky Flats Plant
P.O. Box 928
Golden, CO 80402-0928

RE: Technical Memorandum
No. 7, Operable Unit 1

Dear Mr. Lockhart:

Pursuant to the conference call on August 10, 1992 regarding the draft Technical Memorandum No. 7, Description of Models for the Public Health Evaluation, Operable Unit 1 (OU 1), it is EPA's understanding that the following review comments will be addressed by the Department of Energy (DOE) either by formal response or incorporation into the draft Remedial Investigation report for OU 1.

1. Figure 2-1 on page 2-2 and subsequent text indicate that the french drain completely intercepts contaminated ground water migrating from the OU 1 individual hazardous substances sites. In fact, the fate of the OU 1 contaminated shallow ground water as depicted in Figure 2-1 has not been adequately established. A flow net of the entire 881 Hillside area is required. EPA understands that additional monitoring wells are currently being constructed by DOE to collect water level data at the west end of the french drain to support a flow net which incorporates high flow (April through June) data. Until this work is complete, the adequacy of the french drain is not firmly established and the possibility of shallow ground water bypassing the french drain must be considered.

2. The consideration of the effectiveness of the french drain is relevant only after the baseline risk assessment has been completed. The baseline risk assessment is an assessment of the risks posed at a site in the **absence** of remedial action. Remedial action includes interim remedial actions. Therefore, the french drain cannot be considered in the calculation of baseline risk at OU 1. The results of the baseline risk assessment will be used along with other factors to make remedial action decisions at OU 1 and to determine the remediation goals should action be warranted.

After the remediation goals are determined, interim actions must be considered. If, for instance, the french drain has achieved the required remediation goal, no further action will be required. If the french drain has achieved only part of the remediation goal, remedial alternatives must be considered to make up the difference.

3. On page 2-3, Figure 2-2 implies that surface water runoff cannot bypass the french drain. As presently constructed, the majority of storm water runoff flows across the finished surface of the french drain and continues down the 881 Hillside. Figure 2-2 should be clarified to exclude its applicability to surface water impacts.

Agree.

4. On page 2-12, provide a reference for the statement in the first paragraph that the erosion rate is a cubic function of wind speed.

5. The second paragraph on page 3-21 implies that only emission rates from undisturbed soil will be considered in the OU 1 risk assessment. Emission rates from soil disturbing activities such as excavation for future construction should also be considered in the risk assessment.

6. The results of dispersion modelling to support the evaluation of the air pathways should be discussed along with the air monitoring data collected in OU 1.

7. A procedure should be included in Section 3.4 for calibrating the surface water model to actual field conditions. Without field calibration, the Universal Soil Loss Equation model is potentially an inaccurate predictive tool.

If you require clarification of any of these comments, please contact Bonnie Lavelle at (303) 294-1067.

Sincerely,

Martin Hestmark

Martin Hestmark, Manager
Rocky Flats Project

cc: Joe Schieffelin, CDH
Scott Grace, DOE
Dennis Smith, EG&G